

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI

HARRY G Campbell III #1005421)
(full name) (Register No.))

15-0745-CV-W-DGK-P

Plaintiff(s).

Case No. _____

v.

MIKE SHARP)
(Full name))

Defendants are sued in their (check one):

____ Individual Capacity

____ Official Capacity

☒ Both

Defendant(s).

COMPLAINT UNDER THE CIVIL RIGHTS ACT OF 42 U.S.C. § 1983

I. Place of present confinement of plaintiff(s): Jefferson City Correctional
Center 8200 Fenceline Road Jefferson City MO 65101

II. Parties to this civil action:
Please give your commitment name and any another name(s) you have used while incarcerated.

A. Plaintiff HARRY G Campbell III Register No. 1005421
Address 8200 Fenceline Road Jefferson City MO
65101

B. Defendant Mike Sharp

Is employed as Sheriff of Jackson County Sheriff
Missouri, 3310 NE KENNARD DR Lees Summit MO 64064

For additional plaintiffs or defendants, provide above information in same format on a separate page.

For additional plaintiffs, provide the information in the same format as above on a separate page. If there is more than one plaintiff, each plaintiff must sign the Complaint, and each plaintiff is responsible for paying his or her own complete, separate filing fee.

B. Defendants

Defendant #1:

Full Name: JANE DOE #2
Current Job Title: Deputy Sheriff of Jackson County
Current Work Address 3310 NE RENNAN DR, Lee's
Summit, MO 64064

Defendant #2:

Full Name: John Doe
Current Job Title: Deputy Sheriff of Jackson County
Current Work Address 3310 NE RENNAN DR, Lee's
Summit, MO 64064

Defendant #3:

Full Name: MARY/MARQUEZ PAMELA TAYLOR
Current Job Title: Population Control J.C.D.C.
1300 Cherry KC MO 64106.

Defendant: Michael R. Fogel

Current Job Title: Prosecuting Attorney

Current work Address: 625 E 26th Street
KANSAS CITY, MO 64108

Defendant: MARY MARQUEZ

Current Job Title: Director of Legal Services

Current work Address: 625 E 26th Street
KANSAS CITY, MO 64108

PAGE 2

For additional plaintiffs, provide the information in the same format as above on a separate page. If there is more than one plaintiff, each plaintiff must sign the Complaint, and each plaintiff is responsible for paying his or her own complete, separate filing fee.

B. Defendants

Defendant #1:

Full Name: ~~Ricardo Rios~~ Ricardo Rios

Current Job Title: Warden

Current Work Address 200 S. Second Street
Pekin, IL 61554

Defendant #2:

Full Name: Tammy Girard

Current Job Title: Asst Warden

Current Work Address 200 S Second Street
Pekin IL 61554.

Defendant #3:

Full Name: Michael Neghorst C.M.G. AT

Current Job Title: 200 S Second Street Pekin IL
61554.

Defendant: Jay, Walters, Casemanager
200 S second Street Pekin IL, 61554

For additional plaintiffs, provide the information in the same format as above on a separate page. If there is more than one plaintiff, each plaintiff must sign the Complaint, and each plaintiff is responsible for paying his or her own complete, separate filing fee.

B. Defendants

Defendant #1:

Full Name: JANE JOE, #1
Current Job Title: Correctional Officer
Current Work Address 200 S. Second Street Pekin
IL 61554

Defendant #2:

Full Name: MARC Hewitt,
Current Job Title: Records
Current Work Address 200 S. Second Street Pekin
IL 61554,

Defendant #3:

Full Name: Jeremiah W. Jay Nixon
Current Job Title: Governor of Missouri
PO Box 720 Jefferson City MO
65101.

Defendant: PAT QUINN

Current Job title: EX-Governor of Illinois
100 West Randolph (16-100) Chicago, IL 60601

Defendant: ANGELA DAVIS

Current Job title: Records Manager
200 S. Second Street Pekin IL 61554.

page 4

III. Do your claims involve medical treatment? Yes _____ No X

IV. Do you request a jury trial? Yes X No _____

V. Do you request money damages? Yes X No _____

State the amount claimed? \$ 350 / 000 (actual/punitive)

VI. Are the wrongs alleged in your complaint continuing to occur? Yes _____ No (NA)

VII. Grievance procedures:

A. Does your institution have an administrative or grievance procedure? (N/A)
Yes _____ No _____

B. Have the claims in this case been presented through an administrative or grievance procedure within the institution? Yes _____ No (NA)

C. If a grievance was filed, state the date your claims were presented, how they were presented, and the result of that procedure. (Attach a copy of the final result.)

N/A

D. If you have not filed a grievance, state the reasons.

This Action has to do with the courts, I was Released From said Institution before I found out that Institutional Employees had something to do with ~~the~~ said Action.

VIII. Previous civil actions:

A. Have you begun other cases in state or federal courts dealing with the same facts involved in this case? Yes X No _____

B. Have you begun other cases in state or federal courts relating to the conditions of or treatment while incarcerated? Yes X No _____

C. If your answer is "Yes," to either of the above questions, provide the following information for each case.

(1) Style: Plaintiff
(Plaintiff) (Defendant)

(2) Date filed: 10-4-2012

- (3) Court where filed: SAME
- (4) Case Number and citation: 4:12-cv-01237-DGK
- (5) Basic claim made: Excessive force
- (6) Date of disposition: 2015
- (7) Disposition: Denied
(Pending) (on appeal) (resolved)
- (8) If resolved, state whether for: (Plaintiff) or Defendant)

For additional cases, provide the above information in the same format on a separate page.

IX. Statement of claim:

- A. State here as briefly as possible the facts of your claim. Describe how each named defendant is involved. Include the names of other persons involved, dates and places. Describe specifically the injuries incurred. Do not give legal arguments or cite cases or statutes. You may do that in Item "B" below. If you allege related claims, number and set forth each claim in a separate paragraph. Use as much space as you need to state the facts. Attach extra sheets, if necessary. Unrelated separate claims should be raised in a separate civil action.

Small Statement of facts (1) page.
Statement of claim # (2) 3 page (10 pgs)
Legal claims # (1) 3 21 page's of claims

- B. State briefly your legal theory or cite appropriate authority:

Please see page's numbered (1-10) with (A-G)
IX Legal Theory

X. Relief: State briefly exactly what you want the court to do for you. Make no legal arguments.

See Attached pages (21) & (22)

XI. Counsel:

A. If someone other than a lawyer is assisting you in preparing this case, state the person's name. _____

B. Have you made any effort to contact a private lawyer to determine if he or she would represent you in this civil action? Yes X No _____

If your answer is "Yes," state the names(s) and address(es) of each lawyer contacted.

Will provide with motion for Appointment of ...
Counsel, due to Fact Jail is prohibiting me to Find
Any Attorney

C. Have you previously had a lawyer representing you in a civil action in this court? Yes _____ No X

If your answer is "Yes," state the name and address of the lawyer.

I declare under penalty of perjury that the foregoing is true and correct.

Executed (signed) this 14th day of September 2015

Harry G Campbell III
Signature(s) of Plaintiff(s)

LEGAL CLAIMS

THIS COMPLAINT SETS FORTH 15 COUNTS OF VIOLATIONS OF Plaintiff Harry G Campbell III's CIVIL RIGHTS AND US CONSTITUTIONAL RIGHTS

Count I Violation of Constitutional Rights (BIVENS V SIX 403 U.S. 388) (1971) 18 U.S.C. § 3182, (USCA Const. Art. 4 § 2, C12, 14th Amendment, (U.C.E.A. CODE TIT. 225/ 345, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 20, 21, 22, 23, 26, 27, 30

Count II Abuse of position given by U.S. government (BIVENS V. SIX 403 U.S. 388) (1971) 5th and 14th Amendments

Count III Abuse of process (BIVENS V. SIX 403 U.S. 388) (1971) 5th and 14th Amendments

Count IV Failure to protect (BIVENS V SIX 403 U.S. 388) (1971) 5th and 14th Amendments

Count V Conspiracy to interfere with Civil Rights (BIVENS V SIX 403 U.S. 388) (1971), 42 USC § 1985 5th and 14th Amendments

Count VI Neglect to prevent Conspiracy (BIVENS V SIX 403 U.S. 388) (1971) 42 USC § 1986, and 5th and 14th Amendments

Count VII Violation of Privacy Act (BIVENS V. SIX 403 US 388)
(1971) 5th and 14th Amendments

Count VIII Deprivation of Due process "procedural" CAUSE
MENTAL AND EMOTIONAL DISTRESS (BIVENS V. SIX 403 US 388)
(1971) 5th and 14th Amendments

Count IX Deprivation of procedural Due process
CAUSED HUMILIATION AND EMBARRASSMENT.
(BIVENS V. SIX 403 US 388) (1971) 5th and 14th Amendments

Count X Violation of Constitutional Rights (42 U.S.C. § 1983)
AND 5th and 14th Amendments. 18 USC § 3182 AND U.S.C.A
CONSE. Art. 4 § 2, C12, Act 225/3, 4, 5, 7, 8, 9, 10,
11, 12, 13, 14, 15, 16, 17, 20, 21, 22, 23, 26, 27, 30

Count XI CONSPIRACY to INTERFERE with Civil Rights
(42 USC § 1983) 5th and 14th Amendments AND 42 USC 1985

Count XII Abuse of position given by STATE (42 USC § 1983)
AND 5th and 14th Amendments

Count XIII Neglect to prevent CONSPIRACY
(42 U.S.C.A 1986) AND 5th and 14th Amendments

Count XIV Deprivation of procedural Due
PROCESS CAUSED Humiliation AND Embarrassment
(42 USC. 1983) AND 5th and 14th Amendments

Count XII Deprivation of procedural
DUE PROCESS CAUSED mental and emotional
distress (42 U.S.C. 1983) and 5th and 14th Amendments

THERE ARE EIGHT (8) COUNTS AGAINST
Defendant RICARDO RIOS IN THIS SECTION

Defendant RIOS, failed at his duty of Warden of POKIN
Federal Correctional Institution by participating in a
conspiracy to deprive Plaintiff Campbell of his Civil
Rights and Constitutional Rights also deliberately refusing
to follow the United States extradition clause. Said
co-conspirators are defendants T. Girard, M. Wehhouse,
J. Walters, A. DAVIS, M. Hewitt. Defendant RIOS allowed &
instructed subordinates to allow defendants
JANE DOE #2 and John DOE #1 to illegally transport
plaintiff from ILLINOIS to MISSOURI in absence of a
signed extradition warrant, a waiver of plaintiff's
extradition rights or Habeas hearing. Defendant RIOS
undoubtedly had intimate knowledge of the legalities
of plaintiff's extradition. For fact that said agency
which lodged detainee, had on September 23rd, 2010
sent Defendant RIOS a letter stating the IADA did
not apply to plaintiff's case. Which leaves only one option
for plaintiff to be transported to another state to face
untried charges, the Uniform Criminal Extradition Act
of ILLINOIS, which is governed by the United States extradition

CLAUSE. DUE to Defendant RIOS' conspiratorial involvement he chose to act with gross negligence and deliberate indifference by refusing to afford plaintiff with the proper procedures of a legal extradition. Any reasonable correctional officer with the education and title of Warden of a Federal Correctional Institution, would know that procedure for any person facing untried charges "only" at the expiration of Federal sentence, would be to inform subordinates to have plaintiff of case at Barr to be transported to the Tazwell County Jail. Defendant RIOS' actions were motivated by evil intent. Reckless and callous indifference to plaintiff's federally protected rights which caused plaintiff to feel hopeless, which led to depression, feelings of betrayal, feelings of shame and sleeplessness. These in turn caused mental and emotional distress as well as humiliation and embarrassment. Said violations unequivocally make Defendant RIOS guilty of Cants I, II, III, IV, V, VI, VII, IX, ~~XV~~, ~~XVI~~, ~~XVII~~, ~~XVIII~~, ~~XIX~~

THERE ARE (4) four cants Against Defendant Pat Quinn in this section

Defendant Quinn failed at his duty of governor under the Uniform Criminal Extradition Act, of Illinois, for not adhering to the following procedures (1) Contacting the Attorney General or prosecuting officer of Illinois to assist or investigate the demand of plaintiff, and determine whether plaintiff should be surrendered.

(2) Defendant QUINN also failed to sign and state seal the extradition warrant, indictment, etc. from Defendant Nixon, to allow Defendants JANE DOE #2 and John Doe to transport plaintiff to Missouri. Defendant QUINN did not insure that plaintiff was afforded any of the following: A waiver of his extradition rights or Habeas hearing. Defendant QUINN failed to insure plaintiff was properly extradited from the state of Illinois to the state of Missouri, causing deprivation of plaintiff's constitutional rights and civil rights. These rights were undisputably due to plaintiff as he faced "only" untied charges in Missouri. For the fact plaintiff was denied liberty without proper process caused plaintiff to feel hopeless, betrayal, and shame which led to depression and sleeplessness. This caused plaintiff mental and emotional distress as well as humiliation and embarrassment. Said violations of civil rights and constitutional rights unequivocally makes Defendant QUINN guilty of the following Counts X, XIV, XV XII

There are (14) ~~5~~ counts against defendant TAMMY GIRARD in this section

Defendant GIRARD failed at her duty of Asst. Warden of Pekin Federal Correctional Institution by participating in a conspiracy to deprive plaintiff Campbell of his civil and constitutional rights

Also deliberately REFUSING to stop the SAID CONTINUING CONSPIRACY AGAINST plaintiff. SAID Co-conspirators ARE defendants M. Weghorst, J. Walters, A. Davis, M. Hewitt, R. Rios. Defendant GIRARD signed RELEASE PAPERS of plaintiff Campbell to be RELEASED IN to the custody of defendants JANE DOE #2 & John DOE to ILLEGALLY transport plaintiff from ILLINOIS to MISSOURI IN ABSENCE OF A SIGNED EXTRADITION WARRANT, A WAIVER OF PLAINTIFFS' EXTRADITION RIGHTS, OR A HABEAS HEARING. Defendant GIRARD undoubtedly had INTIMATE KNOWLEDGE OF THE LEGALITIES OF PLAINTIFF'S EXTRADITION for the fact that it is the defendants duty prior to PLAINTIFFS SAID RELEASE also plaintiff spoke directly to defendant GIRARD and defendant REFERRED PLAINTIFF back to the persons who REFERRED PLAINTIFF to defendant GIRARD about the LEGALITIES OF PLAINTIFF RELEASE. Due to defendant GIRARD'S CONSPIRATORIAL INVOLVEMENT defendant CHOSE to ACT WITH GROSS NEGLIGENCE AND DELIBERATE INDIFFERENCE by REFUSING to AFFORD PLAINTIFF with the proper PROCEDURES OF A legal EXTRADITION. Any REASONABLE CORRECTIONAL OFFICER WITH the EDUCATION and title of Asst. Warden of A Federal Correctional Institution would KNOW that SINCE PLAINTIFF WAS FACING UNTRIED CHARGES IN MISSOURI plaintiff should HAVE BEEN transported to the Tazwell county JAIL, to FACE EXTRADITION PROCEDURES BEFORE BEING taken out of the

(6)

STATE OF ILLINOIS. Defendant Girard's actions were motivated by evil intent, reckless and callous indifference to plaintiff's federally protected rights, which caused plaintiff to feel hopeless, which led to depression, feelings of betrayal, feelings of shame, and sleeplessness. These in turn caused mental and emotional distress as well as humiliation and embarrassment. Said violations unequivocally makes defendant Girard guilty of Counts I, II, III, IV, V, VI, VIII, IX, XII, XVI, XVII, XVIII, XIX.

There are (18) ~~sixteen~~ counts against defendant Michael Weghorst in this section.

Defendant Weghorst failed at his duty of CMC of Rekin Federal Correctional Institution by participating in a conspiracy to deprive plaintiff Campbell of his civil and constitutional rights, also deliberately refusing to stop the said conspiracy continuing against plaintiff. Said co-conspirators are defendants R. Rios, T. Girard, J. Walters, A. Davis, M. Hewitt. Defendant M. Weghorst signed release papers for plaintiff to be released to the custody of defendants Jane Doe #2 and John Doe, to illegally transport plaintiff from Illinois to Missouri in absence of a signed extradition warrant, a waiver of plaintiff's extradition rights, or a habeas hearing. Defendant Weghorst undoubtedly had intimate knowledge of the legalities of plaintiff's extradition for fact that it is the defendants duty.

PRIOR to PLAINTIFFS SAID RELEASE. ALSO PLAINTIFF
SPOKE WITH DEFENDANT WEGHORST AND DEFENDANT REFERRED
PLAINTIFF TO DEFENDANT WALTERS, WHO IS THE SAME
PERSON WHO DIRECTED PLAINTIFF TO DEFENDANT WEGHORST
ABOUT THE LEGALITIES OF PLAINTIFFS RELEASE. DEFENDANT
WEGHORST ALSO REFUSED TO PROVIDE PLAINTIFF WITH A
GRATUITY PAYMENT OF \$ 500.00 FIVE HUNDRED US
DOLLARS, WHICH WAS DUE TO A PERSON OF THE PLAINTIFFS
STATUS, DUE TO DEFENDANT WEGHORST CONSPIRATORIAL
INVOLVEMENT DEFENDANT CHOSE TO ACT WITH GROSS
NEGLECT AND DELIBERATE INDIFFERENCE BY REFUSING
TO AFFORD PLAINTIFF WITH THE PROPER PROCEDURES OF A
LEGAL EXTRADITION. ANY REASONABLE CORRECTIONAL OFFICER
WITH THE EDUCATION AND TITLE OF CMC OF A FEDERAL
CORRECTIONAL INSTITUTION, WOULD KNOW THAT BEING THAT
PLAINTIFF WAS FACING UNTRIED CHARGES IN MISSOURI
PLAINTIFF SHOULD HAVE BEEN TRANSPORTED TO THE TAZWELL
COUNTY JAIL, TO FACE EXTRADITION PROCEDURES BEFORE
BEING TAKEN OUT OF THE STATE OF ILLINOIS. DEFENDANT
WEGHORST ACTIONS WERE MOTIVATED BY EVIL INTENT, RECKLESS
AND CALLOUS INDIFFERENCE TO PLAINTIFFS FEDERALLY
PROTECTED RIGHTS, WHICH CAUSED PLAINTIFF TO FEEL HOPELESS
WHICH LED TO DEPRESSION, FEELINGS OF BETRAYAL, FEELINGS OF
SHAME, AND SLEEPLESSNESS. THESE IN TURN CAUSED MENTAL
AND EMOTIONAL DISTRESS AS WELL AS HUMILIATION AND EMBARRASSMENT.

SAID VIOLATIONS UNEQUIVOCALLY MAKES DEFENDANT
WEGHORST GUILTY OF COUNTS I, II, III, IV, V, VI, VII, VIII, IX, X, XI, XII, XIII, XIV, XV, XVI, XVII, XVIII, XIX

14
THERE ARE ~~(11)~~ COUNTS AGAINST DEFENDANT J. WALTERS IN THIS SECTION.

DEFENDANT WALTERS FAILED AND ABUSED HIS DUTY AS PLAINTIFF'S CASE MANAGER AT FEDERAL CORRECTIONAL INSTITUTION by PARTICIPATING IN A CONSPIRACY TO DEPRIVE PLAINTIFF OF HIS CIVIL AND CONSTITUTIONAL RIGHTS, ALSO DELIBERATELY REFUSING TO STOP THE SAID CONSPIRACY CONTINUING AGAINST PLAINTIFF. SAID CO-CONSPIRATORS ARE DEFENDANTS R. BROS, T. GIRARD, A. DAVIS, M. HEWITT, M. WEGHORST. DEFENDANT WALTERS INSTRUCTED SECRETARY JENIFER POISAL TO MAKE A NEW RELEASE FORM ON THE DATE OF DECEMBER 9TH 2010 AND HAVE PLAINTIFF CAMPBELL RESIGN THEM DUE TO THE FACT THAT SAID PAPERS STATED A DIFFERENT RELEASE LOCATION THAN THAT OF 3310 NE RENNAU DR. LEES SUMMIT, MO 64064. BY DOING SO DEFENDANT WALTERS INITIATED HIMSELF BEYOND DOUBT IN THE CONSPIRACY OF PLAINTIFF RIGHTS. DEFENDANT WALTERS ALSO SIGNED THE RELEASE PAPERS OF PLAINTIFF TO BE RELEASED TO THE CUSTODY OF DEFENDANTS JANE DOE #2 AND JOHN DOE, TO ILLEGALLY TRANSPORT PLAINTIFF FROM ILLINOIS TO MISSOURI IN ABSENCE OF A SIGNED EXTRADITION WARRANT, A WAIVER OF PLAINTIFFS EXTRADITION RIGHTS, OR A HABEAS HEARING. DEFENDANT WALTERS UNDOUBTEDLY HAD INTIMATE KNOWLEDGE OF THE LEGALITIES OF PLAINTIFFS EXTRADITION, FOR FACT IT IS THE DEFENDANTS DUTY. PRIOR TO PLAINTIFFS SAID RELEASE. ALSO PLAINTIFF REPEATEDLY ASKED DEFENDANTS WALTERS IF THE PROCEDURE THAT WAS BEING USED AGAINST HIM WAS PROPER AND BEING THAT THE DEFENDANT KNEW PLAINTIFF WAS UNEDUCATED ON THE BASIS OF EXTRADITION,

Which defendant Walters used to his Advantage AS he further violated plaintiff Campbell's federally protected rights. Due to defendant's Walters CONSPIRATORIAL INVOLVEMENT defendant chose to ACT WITH GROSS NEGLIGENCE AND DELIBERATE INDIFFERENCE by REFUSING to AFFORD plaintiff WITH the proper procedures of a legal extradition.

Any reasonable correctional officer with the education AND title of Case Manager of a federal correctional institution would know that being plaintiff was facing UNTRIED charges in Missouri, plaintiff should have been transported to the Tazewell County Jail to face extradition procedures BEFORE being taken out of the state of Illinois. Defendant Walters took it in his power to instruct his secretary to personally change that. Defendant Walters' actions were motivated by EVIL INTENT, RECKLESS AND CALLUS INDIFFERENCE to plaintiff's federally protected rights which caused plaintiff to feel hopeless, which led to depression, feelings of betrayal, feelings of shame, and sleeplessness. These in turn caused mental and emotional distress as well as humiliation and embarrassment. Said violations unequivocally make defendant Walters guilty of counts I, II, III, IV, V, VI, VII, VIII, IX, X, XI, XII, XIII, XIV, XV, XVI, XVII, XVIII, XIX.

19

THERE ARE (1) NINE COUNTS AGAINST defendant Angela Davis IN THIS SECTION.

Defendant DAVIS failed at her duty of Records Manager of PEKIN Federal Correctional Institution by PARTICIPATING IN A CONSPIRACY TO DEPRIVE PLAINTIFF Campbell of his CIVIL AND CONSTITUTIONAL RIGHTS, ALSO DELIBERATELY REFUSING TO STOP SAID CONSPIRACY CONTINUING AGAINST PLAINTIFF. SAID CO-CONSPIRATORS ARE DEFENDANTS R. RIOS, T. GIRARD, J. WALTERS, M. HEWITT, AND M. WEGHORST. Defendant DAVIS signed release papers for PLAINTIFF to be released to the custody of defendants JANE DOE #2 AND John Doe to illegally transport PLAINTIFF from ILLINOIS to MISSOURI IN ABSENCE OF A SIGNED EXTRADITION WARRANT, A WAIVER OF PLAINTIFF'S EXTRADITION RIGHTS, OR A HABEAS HEARING. Defendant DAVIS undoubtedly had INTIMATE KNOWLEDGE OF THE LEGALITIES OF PLAINTIFF'S EXTRADITION FOR FACT THAT IT IS THE DEFENDANTS DUTY PRIOR TO PLAINTIFF'S SAID RELEASE, ALSO PLAINTIFF spoke with defendant DAVIS AND WAS REFERRED TO DEFENDANTS M. HEWITT, J. WALTERS, AND M. WEGHORST. Defendants Weghorst and Walters REFERRED PLAINTIFF TO DEFENDANT DAVIS. SAID DEFENDANT REFUSED TO ANSWER ANY OF THE (3) THREE ADMINISTRATIVE REMEDY'S PLAINTIFF FORWARDED TO DEFENDANT DAVIS. THE (1) ONE ADMINISTRATIVE REMEDY THAT PLAINTIFF HAND DELIVERED AT CHOW LINE WAS ANSWERED BY DEFENDANT HEWITT TELLING PLAINTIFF THE SAME THING HE WAS VERBALLY TOLD BY DEFENDANT HEWITT, WHEN HE WAS REFERRED TO DEFENDANT HEWITT BY DEFENDANT WALTERS; TELLING PLAINTIFF TO CONTACT DEFENDANT WEGHORST.

DUE to defendant DAVIS' CONSPIRATORIAL INVOLVEMENT defendant chose to act with GROSS NEGLIGENCE AND DELIBERATE INDIFFERENCE by REFUSING to AFFORD plaintiff with PROPER PROCEDURES of A legal extradition. Any REASONABLE CORRECTIONAL OFFICER with the EDUCATION AND TITLE of RECORDS MANAGER of a FEDERAL CORRECTIONAL INSTITUTION, would know that BEING plaintiff WAS FACING UNTRIED CHARGES IN MISSOURI plaintiff should HAVE BEEN TRANSPORTED to the TAZWELL Canty Jail to FACE EXTRADITION PROCEDURES BEFORE BEING TAKEN OUT OF THE STATE OF ILLINOIS. Defendant DAVIS' ACTIONS were motivated by evil intent, RECKLESS AND CALLOUS INDIFFERENCE to plaintiff's federally protected RIGHTS. Which CAUSED plaintiff to feel HOPELESS which led to DEPRESSION, FEELINGS of betrayal, FEELINGS of SHAME AND SLEEPLESSNESS. THESE IN TURN CAUSED MENTAL AND EMOTIONAL DISTRESS AS WELL AS HUMILIATION AND EMBARRASSMENT. SAID VIOLATIONS UNEQUIVOCALLY MAKES defendant DAVIS guilty of COUNTS I, II, III, IV, V, VI, VII, VIII, IX. ~~XV XVI XVII XVIII XIX~~

THERE ARE ~~NINE~~ NINE COUNTS AGAINST defendant Mark Hewitt in this section.

Defendant Hewitt failed at his duty of Records Dept. PERSONELL of Pekin Federal Correctional Institution by PARTICIPATING IN A CONSPIRACY to DEPRIVE plaintiff Campbell of HIS CIVIL AND CONSTITUTIONAL RIGHTS, ALSO DELIBERATELY REFUSING to STOP the SAID CONSPIRACY

CONTINUING AGAINST PLAINTIFF. SAID CO-CONSPIRATORS ARE DEFENDANTS R. RIOS, T. GIRARD, J. WALTERS, A. DAVIS, M. WEGHOUST. Defendant Hewitt signed RELEASE PAPERS for plaintiff to be RELEASED INTO the custody of defendants JANE DOE #2 AND JOHN DOE to ILLEGALLY transport plaintiff from ILLINOIS to MISSOURI IN ABSENCE OF A SIGNED EXTRADITION WARRANT, A WAIVER OF PLAINTIFF'S EXTRADITION RIGHTS, OR A HABEAS HEARING. Defendant Hewitt undoubtedly had INTIMATE KNOWLEDGE OF THE LEGALITIES OF PLAINTIFF'S EXTRADITION FOR FACT THAT IT IS THE DEFENDANTS DUTY PRIOR TO PLAINTIFF'S SAID RELEASE. PLAINTIFF REPEATEDLY spoke with defendant HEWITT ASKING IF THE PROCEDURES they WERE following PERTAINING to plaintiff's SITUATION WERE CORRECT. Defendant HEWITT'S EXACT WORDS WERE "this happens all the time". Due to the CONSPIRATORIAL INVOLVEMENT defendant chose to act with GROSS NEGLIGENCE AND DELIBERATE INDIFFERENCE by REFUSING to AFFORD plaintiff with the PROPER PROCEDURES OF A legal EXTRADITION. ANY REASONABLE CORRECTIONAL OFFICER with the EDUCATION AND title of RECORDS OFFICER of a FEDERAL CORRECTIONAL INSTITUTION would know that BEING plaintiff WAS FACING UNTRIED CHARGES IN MISSOURI plaintiff SHOULD HAVE BEEN trans ported to the Tazewell County Jail to FACE EXTRADITION PROCEDURES BEFORE BEING TAKEN OUT OF THE STATE OF ILLINOIS. Defendant Hewitt's ACTIONS WERE motivated by EVIL INTENT, RECKLESS AND

CALLOUS INDIFFERENCE TO PLAINTIFF'S FEDERALLY
PROTECTED RIGHTS WHICH CAUSED PLAINTIFF TO FEEL
HOPELESS WHICH LED TO DEPRESSION, FEELINGS OF BETRAYAL,
FEELINGS OF SHAME AND SLEEPLESSNESS. THESE IN TURN
CAUSED MENTAL AND EMOTIONAL DISTRESS AS WELL AS
HUMILIATION AND EMBARRASSMENT. SAID VIOLATIONS
UNEQUIVOCALLY MAKES DEFENDANT HEWITT GUILTY OF
COUNTS I, II, III, IV, V, VI, VII, VIII, IX. ~~XV, XVI, XVII,~~
~~XVIII, XIX~~

Three 7 counts against Defendant
Jane #1 Doe in this section.

Defendant Doe failed at her duty of correctional officer of PEKIN federal correctional institution by being informed of a conspiracy to interfere with the civil and constitutional rights of plaintiff and did nothing to put a stop to it. Defendant Doe also revealed sensitive information which said defendant should have not had knowledge of about plaintiff to another inmate and maybe others and officers. Due to defendant Doe's neglect to prevent a conspiracy and failure to protect she chose to act with gross negligence and deliberate indifference by doing nothing to put a stop to a ongoing conspiracy of plaintiff's rights. Also revealing sensitive information about the legality of plaintiff's untried charges stemming from a detainee any reasonable correctional officer working in the S.H.U knows that to reveal information of a sensitive matter to other inmates would put plaintiff's life in jeopardy or vice versa basically a extreme security risk defendants Doe's actions were motivated by evil intent reckless and callous indifference to plaintiff's federally protected rights which cause plaintiff to feel hopeless which led to depression and sleeplessness this caused plaintiff mental and emotional distress as well as humiliation and embarrassment said violations of civil rights and constitutional rights unequivocally made defendant Jane #1 Doe guilty of counts I, II, IV, VI, VII, VIII, IX.

15

There are 8 counts against
Defendant Jay Nixon in this section.

Defendant Nixon failed at his duty of governance by not issuing a warrant under the seal of Missouri for defendants Jane#2 and John Doe so said defendants could legally and properly extradite plaintiff from Illinois to Missouri said improper actions of defendant Nixon caused deprivation of plaintiff as he faced "only" untried charges in Missouri for the fact that plaintiff was denied liberty without proper process of the U.C.E.A. and the extradition clause of the U.S caused plaintiff to feel hopeless, betrayal and shame which led to depression and sleeplessness. This caused plaintiff mental and emotional distress as well as humiliation and embarrassment. said violations of civil and constitutional rights unequivocally makes defendant Nixon guilty of the following counts:
~~X, XII, XIV, XV, XVI, XVII, XVIII, XIX~~

There are 10 counts against
defendant Mike Sharp in this section.

Defendant Sharp failed at his duty of sheriff of Jackson County by participating in a conspiracy to deprive plaintiff of his civil and constitutional rights said co-conspirators are M. Hewitt, A. Davis, and Jane#2 and John Doe all defendants in this complaint. Defendant Sharp instructed defendant's Jane#2 and John Doe to illegally extradite plaintiff from Illinois to Missouri in absence of signed extradition warrant waiver of his extradition rights of habeas hearing defendant Sharp had knowledge that plaintiff faced untried charges in Missouri defendant knew that to proceed against plaintiff would violate his clearly protected federal rights due to defendant Sharp's conspiratorial involvement defendant chose to act with gross negligence and deliberate indifference by refusing to afford plaintiff with the proper procedures of a legal extradition. Any reasonable law enforcement officer with the rank of county sheriff knows that since plaintiff was facing untried charges in Missouri he should be picked up at the Jackson County jail in Illinois after proper extradition procedures were followed defendant Sharp's actions were motivated by evil intent, reckless and callous indifference to plaintiff federally protected rights which caused plaintiff to feel hopeless of shame and sleeplessness these intent caused mental

And emotional distress as well as humiliation
and mental and emotional distress as well as
humiliation and embarrassment said violations
unequivocally makes defendant Sharp guilty of
counts ~~X, XI, XII, XIII, XIV, XV, XVI, XVII~~
~~XVIII XIX~~

There are 10 counts against
Defendants Jane#2 and John Doe
in this section

Defendant Jane#2 and John Doe failed at there
duty of deputy sheriff by participating in an
ongoing conspiracy to deprive plaintiff of his
civil and constitutional rights said co-conspirators
are defendants M. Hewitt, A. Davis and defendants
supior Mike Sharp defendants Jane#2 and John Doe
involvement is said conspiracy motivated them to
proceed against plaintiff by extraditing him in
abuse of a signed extradition warrant, waiver
of extradition rights of habeas hearing defendants
Doe also had intimate knowledge of there illegal
actions as plaintiff asked defendants what
they were doing legal they stated yes and showed
me a copy of a warrant from the juvenile court not a
signed extradition warrant. Said defendants also
made hurtful jokes about plaintiffs status and
paraded him around in society hand cuffed and
shackled if defendants were doing there duty's
properly they could have stopped at different county
jails for restroom breaks and food for plaintiff
but since what they were doing was illegal they
couldn't explain there self to respectful officers
of the law there lawlessness Due to both of
these defendants conspiratorial involvement
defendants chose to act with gross negligence

and deliberate indifference by refusing to afford plaintiff with the proper procedures of a legal extradition. Any reasonable law enforcement officer with the rank of sheriff's deputy knows the legality of extraditing a person upheld with charges from one state to another both defendants actions were motivated by evil intent reckless and callous indifference to plaintiff's federally protected rights which caused plaintiff to feel hopeless which led to depression, feelings of betrayal feelings of shame and sleeplessness these injuries caused mental and emotional distress as well as humiliation and embarrassment said violations unequivocally make's defendant's Jane#2 DOE and John DOE guilty of counts ~~IX~~, ~~XI~~, ~~XII~~, ~~XIII~~, ~~XIV~~, ~~XV~~, ~~XVI~~, ~~XVII~~, ~~XVIII~~ ~~XIX~~

Small Statement OF PLAINTIFFS FACTS

- (1) Due to the fact that said defendants in collusion to violate Plaintiff's Rights ignored the August 26th 2010, filing date of plaintiffs (IAJA). Then pushed said receiving date to September 7th 2010.

So...

Defendants may contend that said 180 days expired on MARCH 7th 2011. NO MATTER ALL of defendants Actions were unjust.

- (2) Plaintiff asserts that said waiver of extradition was only to be used in conjunction with All other benefits of the (IAJA). Plaintiff also asserts that he only waived... extradition on August 26th 2010 to September 23rd 2010. Said date is when defendants — refused temporary custody, ONCE defendants did so said waiver was automatically "void" & Plaintiff should have been released. Plaintiff also asserts he "did not" waive... extradition willingly NOR legally on — JANUARY 18th 2011.

PAGE # (1) OF (1)

IX Statement of Claim
Attachment # (2)

Count XV

(1) On September 23rd 2010, Plaintiff's Constitutional & Civil Rights were violated, by defendants. In A "Conspiratorial Collusion", pursuant to the non-compliance of the provisions under the (IADA). Article's II(3) & IX, Solidifying the Violations of Plaintiff's 5th, 6th, & 14th Rights & 42 USC § 1985 & 42 USC § 1986.

Count XVI

(2) On January 18th 2011, Plaintiff's Constitutional & Civil Rights were violated by defendants. In A "Conspiratorial, Collusion". Defendants created A procedural, ruse. By illegally using the provisions of the (IADA) to circumvent Plaintiff's illegal ... transfer ~~from~~ Illinois to Missouri. Defendants, Detained, Plaintiff AS A Federal inmate in the (Jackson County Detention Center K.C. MO.) Under the "provisional ruse" that Plaintiff was awaiting trial Under the (IADA) "Article III" Plaintiff was also Denied bond all above actions were extremely Abusive. Solidifying the violations of Plaintiff's 4, 5, 6, & 14th Rights. Also 42 USC § 1985 & 42 USC § 1986.

PAGE # (1) OF (3)

COUNT XVII

- (3) On JANUARY 18th 2011, Plaintiff's Constitutional & Civil Rights were violated by defendants. In A "Conspiratorial Collusion." Defendants refused to provide Plaintiff an extradition hearing, governors warrant, & Denied the right to petition for a writ of habeas corpus. Solidifying the violations of plaintiffs. 4th 5th 6th & 14th Rights, Art IV, § 2, Cl. 2, 18 USCS § 3182 & UAMS 548.231

COUNT XVIII

- (4) On February 26th 2011, Plaintiff's Constitutional & Civil Rights were violated by defendant's. In A "Conspiratorial Collusion" Defendant's Refused to release plaintiff on said 180th day. However Defendant's, issued A Detainer on August 25th 2010. Stopping plaintiff's August 26th 2010 Release to the KANSAS City, Halfwayhouse. Refused to Abide by provisions of Article III, IV, & IX, of the (IADA). Moreover Defendant's further illegally used the provisions of the (IADA) on JANUARY 18th 2011 to detain at F.C.I. on said Day "IE" Not sending plaintiff to the Jackson, County Jail to fight extradition. Transported Plaintiff to (J.C.C.) in K.C. MO. Detain Him there as well with no bond & strictly... Segregated plaintiff from general population.

AND did not try plaintiff in 180 days AS the Agreement stipulates, for such Above actions. ON January the 18th Plaintiff was A free Citizen Under "no" Parole, Probation, from Federal OR the demanding State. Yet WAS treated AS A federal prisoner to solidify defendants "deceit". All Above mentioned solidifies the Violations of plaintiffs 5th, 6th, & 14th Rights.

Count XIX

- (5) All of defendants actions are not just founded on conspiracy to deprive plaintiff of his civil rights & constitutional, but also founded on A unwritten Policy, practice & custom that said defendant's have been... Hoodwinking nonmerchies. Plaintiff's, inmates and (by law) free citizens who were ignorant to the law & there rights. Who unfortunately crossed defendants malicious, vindictive paths. Which solidifies the Reason All... defendants are sued in Official Capacity. 5th & 14th Amendment Rights.

PAGE # (3) OF (3)

There Are 9 Counts Against, Mary Marquez
Director of legal services. ~~X~~, XI, XII, XIII,
XIV, ~~XV~~, XVI, XVIII, XIX. please refer to
Statement of Claim Attachment # 2.

There Are 5 Counts Against, Pamela Taylor
Population Control - Jackson County Detention Center
1300 Cherry Street Kansas City, Mo 64106. XI, XII, XIII,
XVI XVIII. Please refer to S. of C. Attachment #2

There Are 9 Counts Against, Michael R. Fogal
Prosecuting Attorney. ~~X~~, XI, XII, XIII, XIV, XV
XVI, XVIII, XIX. please refer to S. of. Attachment
#2

PAGE # (1) OF (1)

IX Legal Theory

- (A) The provision of the (IAJA) requiring trial within 180 days after demand by the prisoner on any outstanding charge for which a detainer has... been filed. 18 USC App 2, Art III(A). Has appropriately been characterized as a statutory right to speedy trial. See eg. Williams v. Maryland 445 F. Supp. 1216, 1222 (D. Md 1978). Moreover a prisoner from the "undue" & oppressive incarceration, that often results from an excessive delay in processing detainer. See ... State v. Barnes 273 Md 195, 203, 328 A.2d 737, 743 (1974). The (IAJA) is certainly an act intended to protect civil rights & that therefore the federal courts have jurisdiction to decide a 1983 claim arising from its violation under 1343(4).

- (B) The difference between Article III & IV, is one is Art III is initiated by the prisoner & Article IV is initiated by the prosecutor. However in this case at bar plaintiff is not requesting nor is he asserting that the court construe ... his filing as to say he was entitled a extradition hearing pursuant to the (IAJA) provisions on Article IV. He is stating that the defendants used the provisions of Article III for there,

very own benefits. In doing so they denied A Plaintiff the benefits he was entitled to by the use of A detainee & key provisions of the (IAJFA) to streamline the Abduction of Plaintiff.

Article IX of the (IAJFA) states that the Agreement "shall be liberally construed to effectuate its purpose."

A prisoner who has had a detainee lodged against him is seriously disadvantaged by...

Such action." Plaintiff in case At Bar was to be released on August 26th 2010."

Moreover from "citation" he is in custody and therefore in no position to seek witness or to preserve his defense. What is more, when detainees are filed against a prisoner he sometimes loses loses interest in institution-opportunities because he must serve his sentence without knowing what additional sentences may lie before him or when if ever he will be in a position to employ the education and skills he may be developing. H. R. Rep. No 91-1018, p3 (1970) See Cuyler v. Adams, 101 S. Ct 703 (1981).

Adams has therefore stated a claim for — relief under 42 U.S.C. § 1983 for asserted violation by state officials of the terms of the (IAJFA).

SEE. *Chavez v. Tibbott*, 498 U.S. 1 (1990)

Plaintiff WAS NO longer A prisoner, had no parole federal or state, had no parole violations federal or state. Defendant's Actions were Completely Arbitrary.

The legal & Constitutional process said individuals — received, on their release from imprisonment is the same process plaintiff was deprived of on his release day of January 15th 2011 see... Neville v. Cavanagh 611 F.2d 673 & Rentschler v. Sheriff 1989 WL 114921 (D. KAN).

Only by faithfully following the provisions of the — statute may a person be lawfully, deprived of his liberty & life extradited from an asylum state to another state there to be tried for the... Commission of a crime "McBride" Id 594 F.2d 610 quoting U.S. v. Meyering 75 F.2d 716, 717 (7th Cir 1938)

As we have not so held before today we join our sister courts, that have held that a violation of state extradition law can serve as the basis... of a § 1983 action. Where the violation of state law causes the deprivation of rights protected by the Constitution & Statutes of U.S. see... Harden v. Pataki 320 F.3d 1289 C.A.11 (GA) (2003)

Without A deprivation of liberty there is no Constitutional duty, to provide due process, but if there is such a deprivation the duty Attaches regardless of the motive for the deprivation. See...

Miller v. Dobier 634 F.3d 412 (CA, Ill, 2011)

Also see... Gable v. City 296 F.3d 531 (C.A. ILL 2002)

- (D) Missouri defendants may assert that they are... not liable for the state of Illinois not providing plaintiff an ~~extradition~~ extradition hearing. However if they "actively" caused or participated in the failure to follow proper procedures.

Taken together, the two MC Bride decisions stand for the proposition that, A plaintiff may prevail in a § 1983 action based on the deprivation of extradition rights... against an agent of the demanding state only if the Agent caused or participated in the deprivation of plaintiff's rights. See... Buchanan v. City 90 F. Supp. 2d 1008 (E.D. Wis) (2000).

- (E) ON September 23rd 2010, A letter was sent from Missouri defendants to Illinois Defendants.

In said letter, Missouri defendants stated we will not be acting on the (IADA)... that Harry G Campbell III has filed with our office. He has less than 180 days left on his sentence. Further more A (IADA) is not amenable to said charges.

To totally understand the knowledge of All... defendants "IE" the "Conspiratorial Calburk," you have to go back to MARCH 23rd 2010 when Kansas City Detectives were illegally allowed to enter F.C.I. PERKIN ILLINOIS... Without A search warrant.

After refusal to talk to the detectives, Plaintiff was threatened that we will make you talk, with Seventy eight days left to be released to the halfway house (June 14th 2010).

A ten-inch knife was planted in my cell by B.C.P. Officers, I was placed in the S.H.U. with A informant for (60 days) until we had A fight. Once we had A fight said (Knife write up) disappeared with no more actions on me or no one else. However said illinois defendants to ~~14~~ 14 good days of my sentence I pushed my halfway-house date to August 26th 2010. Before said date I had A total of 200 plus days to max my sentence, if they lodged A detainer.

However Missouri defendants knew said charges were bogus & that they could not legally get A Extradition warrant now. Did they want to "legally" take me to trial in "180" days. So said defendants joined in A Federal & State Conspiracy to deprive Plaintiff of his Rights.

So for A simple fight, my first violation not to mention & numerous inmates did the same or ... worse & did not get there "already approved".

Bed space taken the reason defendants did this is give me A August 26th 2010, cut date Approximately "47" days ~~which~~ which left plaintiff with "143" days. Less than 180 days "how convenient", coincident... Not likely so, with All of the above facts alone, with the letter of September 23rd 2010. How is it "feasible" for said defendants or Any person with common sense, "IE (which A reasonable person would have known)" to conclude that Plaintiff's waiver of extradition was still valid on January 15th 2011.

Only A person that "actively caused" or "participated", in the failure to follow proper procedures. "IE" joined A, Id 818 in A "conspiratorial collusion". To deprive plaintiff of his "life", "liberty", & "Mental Sanity"... Would believe that said defendants "All" are liable for said actions, And have done And still are secretly still doing the same to this day. Which solidifies defendants being Sued in there Official Capacity.

The plaintiff bears the burden of establishing the existence of a clearly established constitutional right. See ...

RAKOVICH V. WADE, 850 F.2d 1180 (7th Cir. 1988)

The burden is heavy and appropriately so because, qualified immunity is designed to shield from civil liability "All" (but the plainly incompetent or those who knowingly violate the law). As... the defendants in case At bnr. See...

Hughes v. Meyer, 880 F.2d 967, 971 (7th Cir 1984)
(Quoting Malley v. Briggs, 475 U.S. 335, 341, 89 L. Ed.
2d 271, 106 S. (1092 (1986)).

Once a defendant has pleaded a defense of qualified immunity courts employ a two step analysis: (1) does the alleged conduct set out a constitutional violation, and (2) were the constitutional standards clearly established at the time? See...

Siegel v. Gilley, 500 ~~S.~~ U.S. 226, 231-32 11 S.Ct.
1789 (1991)

This is a curious position considering, the waiver was deemed —
prematurely invalid for purposes of invoking the protections of
the (IADA). If the waiver was unenforceable under the (IADA)
law, how could it be valid as a waiver of extradition? And if
it were valid, as defendants insist, then the Tennessee charges —
should have been dismissed or resolved within 180 days. See
Case 4:15-cv-00745-RK Document 1 Filed 09/25/15 Page 40 of 45
(2015 WL 100856) (7/1/15) (10/1/15) (11/1/15) (12/1/15)

(F) There is no doubt that defendants conspired, to Allow K.C. MO detectives into said prison on MARCH 23rd 2010 ... without a warrant, also on August 24th 2010 when defendant J. Walters told plaintiff that he would not be going to the halfway house due to A (E-mail) he got of the detainer, Plaintiff asked why is it you have this information & records doesn't he stated I don't know I just do. Would you like to talk to me about the robbery, Plaintiff said No & left his office. On September 23rd 2010 said letter was sent only to the warden of F.C.I. Pekin plaintiff did not learn of said letter until June 11th 2011. Plaintiff should have been automatically released to the halfway house for the facts that were stated in said letter. On January 18th 2011 Plaintiff was held at F.C.I. Pekin instead of taken to the Tazewell County Jail to fight extradition. All Above actions could not of happen without said Defendant "All" actively joined in A "Conspiratorial Collusion".

In order to state claim for conspiracy under 42 USC 1985 Plaintiff must allege. (1) the defendants conspired (2) For the purpose of depriving any person or class equal protection of the laws or equal privileges and immunities under laws (3) one or more of the conspirators did or caused to be done any act in furtherance of the conspiracy & (4) as a result another was injured in his person or property or deprived of having & exercising any vital privilege of

Rollen v. Coates, 2009 WL 2391970 (E.D. Mo 2009.
(Quoting Criswell v. City of O'Fallon, Mo 2007 WL 1760744
E.D. Mo 2007). "A conspiracy claim... requires allegations
of specific facts tending to show a meeting of the
minds among the alleged conspirators.
Murray v. Lane 595 F.3d 868, 870 (8th Cir 2010).
Quoting Kearse v. Moffatt, 311 F.3d 891, 892 8th Cir
2002.

(G) It is clear to see from the evidence that defendants
plan was to make plaintiff suffer as long as possible...
until he agreed to talk with detectives. When this
did not work in their favor Defendants disregarded
all Federal laws & state & made their own just to
secure confinement of plaintiff. Disregarding this
already mental-unbalance.

Punitive damages may also be awarded based solely on
a constitutional violation, provided the proper showing
is made. See...

Alexander v. Riga 208 F.3d 1119, 3d 2000) Basista v. Weir 310
F.2d at 87 Punitive damages may be awarded under
42 U.S.C. § 1983 when the defendant's conduct is shown
to be motivated by evil "motive or intent" or when it
involves reckless or callous indifference to the federally
protected rights of others")

Smith v. Wade 461 U.S. 305 6103 S.Ct 1625 (1983)

Granting plaintiff punitive damages in the amount of \$350,000.00 against each defendant jointly and severally.

Plaintiff also seeks his owed to him gratuity payment of \$500.00 travel and hotel expenses for one week from Illinois to Missouri, also money for clothing as defendant Weighorst promised plaintiff.

Plaintiff also seeks a jury trial on all issues triable by jury.

Plaintiff also seeks recovery of his cost in this suit and any additional relief this court deems just, proper and equitable.

RELIEF REQUESTED

(State what relief you want from the court.)

Plaintiff Harry G Campbell III has no plain, adequate or complete remedy at law to redress the wrongs described herein. Plaintiff has been and will continue to be irreparably injured by the conduct of the defendants, that is unless this court grants the declaratory relief which plaintiff seeks.

Wherefore, plaintiff respectfully prays that this court enter judgement.

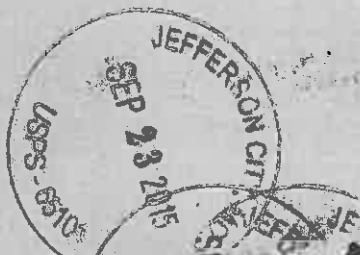
Granting plaintiff Campbell a declaration that the acts and omissions described herein violate his rights under the constitution and laws of the United States and granting plaintiff Campbell nominal damages in the amount of \$100.00 per defendant per each constitutional violation. In addition plaintiff asks for nominal damages of \$100.00 for each hour defendants held plaintiff for said improper transportation to Missouri as plaintiff should have been transported to Tazewell County Jail, instead of being held at FCI Pekin from 12:00 AM til 9:30 AM on the date of January 18th, 2011 which is calculated out to be the amount of \$1,000.00 against each defendant jointly and severally.

Granting plaintiff compensatory damages in the amount of \$115,000.00 against each defendant jointly and severally.

HARRY G Campbell III
10054217-C-207-Jefferson City Correctional Center
8200 Pennington Road
Jefferson City, MO 65101

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